

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

ROBERT HUBBLE, *on behalf of himself* Case No. 1:24-CV-11173-TLL-
and all others similarly situated, PTM

Plaintiff,

v.

LOANDEPOT.COM, LLC,

Defendant.

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**JOINT STIPULATION TO MODIFY
CASE MANAGEMENT AND SCHEDULING ORDER**

Robert Hubble (“Plaintiff”) and loanDepot.com, LLC (“loanDepot”) hereby stipulate to modify the Case Management and Scheduling Order entered by the Court on April 17, 2025. Dkt. No. 47. In support of this stipulation, the parties state as follows:

1. On August 9, 2024, the Court issued its Case Management and Scheduling Order. Dkt. No. 18.
2. On April 3, 2025, the parties submitted their first Joint Stipulation to Modify Case Management and Scheduling Order. Dkt. No. 43.
3. On April 17, 2025, the Court issued an Order granting the parties’ Joint Stipulation to Modify the Scheduling Order. Dkt. No. 47.
4. Since that time, the parties have been diligently working to comply with the deadlines set forth in the Case Management and Scheduling Order and have

exchanged discovery requests and responses in a timely manner. Despite these efforts, certain issues have arisen that require additional time for resolution. Specifically, both Plaintiff and loanDepot have served subpoenas on third parties, including Shift44 and LF Media, Inc.

5. At this stage, the parties are still awaiting the production of documents and information in response to these subpoenas and coordinating a deposition for both entities. Given the complexity of the issues involved and the need for additional time to fully address the outstanding subpoena-related matters, the parties respectfully request a 90-day extension of the current deadlines. This extension will provide the necessary time to resolve any issues arising from these subpoenas.

6. Moreover, the extension of time will provide the parties' sufficient time to complete depositions. Plaintiff intends to depose a couple of individuals at loanDepot. Due to scheduling conflicts, however, such depositions could not be completed in July. Thus, the depositions are currently scheduled for August 19, 2025 and September 4, 2025.

7. In light of the above, the parties seek entry of an order providing a modest extension of the scheduling order deadlines as follows:

<u>Event:</u>	<u>Current Deadline:</u>	<u>New Deadline:</u>
Expert Disclosure, Defendant Served By	July 2, 2025	September 30, 2025
Class Certification Motion Filed By	July 29, 2025	October 27, 2025

Class Certification Motion Response Filed By	September 29, 2025	December 29, 2025
Class Certification Motion Reply Filed By	October 20, 2025	January 19, 2026
Discovery Motions Filed By	November 26, 2025	February 24, 2026
Discovery Cutoff	December 29, 2025	March 30, 2026
Motions Challenging Experts Filed By	February 27, 2026	May 28, 2026

8. This is the parties' second request for an extension of the aforementioned deadlines.

9. The parties agree that neither party will be prejudiced by the requested extension, and the parties certify that they are seeking an extension in good faith.

ACCORDINGLY, IT IS HEREBY STIPULATED that the aforementioned deadlines are extended by 90 days.

Dated: July 1, 2025

/s/ Brittany A. Andres

Eric J. Troutman
Brittany A. Andres
TROUTMAN AMIN, LLP
400 Spectrum Center Drive
Suite 1550
Irvine, CA 92618
troutman@troutmanamin.com
brittany@troutmanamin.com
Tel: (949) 350-5612

/s/ Anthony I. Paronich

Anthony I. Paronich
Paronich Law, P.C.
350 Lincoln Street, Suite 2400
Hingham, MA 02043
(508) 221-1510
anthony@paronichlaw.com

Max S. Morgan, Esquire
THE WEITZ FIRM, LLC
1515 Market Street, #1100

*Attorneys for Defendant
loanDepot.com, LLC*

Philadelphia, PA 19102
Tel: (267) 587-6240
Fax: (215) 689-0875
max.morgan@theweitzfirm.com

George T. Blackmore (P76942)
BLACKMORE LAW PLC
1100 Owendale Drive, Suite M
Troy, MI 48083
T: (833) 343-6743
F: (855) 744-4419
E: george@blackmore.law

*Attorneys for Plaintiff and the Putative
Classes*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 1, 2025, she caused a true and correct copy of the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Brittany A. Andres
Brittany A. Andres